

Supporting Statement for Paperwork Reduction Act Submission
OMB Control Number 1018-0115
USFWS Training Records, Application for FWS Training Request
FWS Form 3-2193
April 4, 2005

Specific Instructions

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Fish and Wildlife Service's National Conservation Training Center (NCTC) is gaining international acclaim as a natural resource training facility. It provides training and education services to Fish and Wildlife Service employees, other bureaus of the Department of the Interior, States, and members of the public. NCTC designed FWS Form 3-2193 (Training Application) as a quick and easy method for prospective students to request training. This collection has been in use for 3 years and is used in the daily workings of the NCTC. We encourage applicants to use FWS Form 3-2193 and to submit their requests electronically.

Legislative authorities include: 5 U.S.C. 4101, et seq. (Government Organization and Employee Training); 5 U.S.C. 1302, 2951, 4118, 4308, 4506, 3101, 43 U.S.C. 1457, Title VI of the Civil Rights Act of 1964 as amended (42 U.S.C. 2000d) Reorganization Plan 3 of 1950, Executive Order 10561, Executive Order 12352, Executive Order 11348 (Providing for Further Training of Government Employees); as amended by Executive Order 12107 (Relating to Civil Service Commission and Labor Management in Federal Service); 5 CFR 410, Subpart C (Establishing and Implementing Training Programs); Americans with Disabilities Act (P.L. 101-336).

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]**

NCTC requires the information provided on the application to contact students; manage and present training classes; validate training records necessary for certification; and to meet periodic reporting requirements of the Office of Personnel Management, the Fish and Wildlife Service's Division of Human Resources, and the Office of Management and Budget (reports on training budget and total student training days). The records contain:

- Participants' names, social security numbers, organizational addresses, phone/fax numbers, email addresses to validate identity and communicate with students.
- Supervisors' names and phone numbers to ensure that training has been approved for the employee.

- Agency affiliation and, if applicable, Federal job series/grade/title for statistical reporting of who is taking training.
- Lodging requirements and special needs to aid in logistically providing for the student.
- Billing information (such as responsible agency, tax ID number/Agency Location Code number, purchase order numbers) to facilitate payment of fees.
- Necessary course information (such as class title/code, start and end date/times) to register the student for the correct class.

Using this information, NCTC frequently has generated reports during the past 3 years regarding what agencies or general demographic attends training, number of training hours, and regional breakouts of training trends.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].

FWS Form 3-2193 is the application form that all students use to register for classes at NCTC. Students, other than Fish and Wildlife Service employees, may use an internet email application form or a paper copy version. For the internet version, the prospective student completes the application information and the form then generates an email to the NCTC data entry clerk for completion of the registration process. We also provide FWS Form 3-2193 in paper form to those members of the public who do not have access to or do not wish to use our electronic means of application.

The large number of students who take training requires an electronic tracking system to more easily manage all aspects of the curriculum. Currently, OTIS (Online Training Information System) allows all prospective students to review the NCTC training catalog via the Internet. OTIS provides Fish and Wildlife Service employees the opportunity to login to the system, view their own transcripts, review Web and Computer based training, and directly register for training classes.

To conform to the President's E-Gov Management Initiative regarding training, we are working with other bureaus of the Department of the Interior to implement a new Departmentwide training tracking system that will replace NCTC's OTIS. It is the intent of the Department to incorporate the use of this application form (or one similar) for non-Department of the Interior applicants.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is no duplication of data. The NCTC routinely uses data from FPPS (Federal Personnel Payroll System) to update information within the system for Fish and Wildlife Service employees. However, other students (private, State, and NGO) must supply the information each time they register in order to ensure that no information has changed since the students last attended training.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection will not impact small businesses. Students complete this form to request training at NCTC.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the information were not collected, public use of the training offered by the Fish and Wildlife Service would significantly decrease. Prospective students not willing or able to use the internet to apply for training would have no means to communicate their interest in NCTC's training program. Tracking NCTC training would become labor intensive and communication to students would be negatively affected. Maintaining transcript records and supplying them when requested would require hours of manually paging through files for each request.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Students complete an application when they register for training classes. This could possibly be more often than every 30 days. There are no other special circumstances.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On January 21, 2005, we published in the Federal Register (70 FR 3221) a notice of our intent to request that OMB renew authority for this information collection. In that notice, we solicited public comments for 60 days, ending on March 22, 2005. We received one comment during this period. The comment was directed to the subject matter, validity, and necessity of the training and not at the need for the information collection. The commenter stated that training should be open to the public and believes that the training we provide is focused on gun, hunting, and violence proponents.

All training courses offered by the NCTC, with the exception of some bureau specific courses, are open to members of the general public who have the required background experience or knowledge to allow their full understanding of the subject matter. Very few of our training courses have an emphasis on guns and hunting. Those courses that do touch on this subject are presented in the context of refuge and wildlife management and law enforcement.

In September 2005, we contacted nine individuals who had recently completed the Training Application form and asked them their opinions about: (1) length of time to complete the application; (2) necessity for the information; (3) whether or not the instructions were clear and concise; and (4) suggestions for improving the form. We received comments from three individuals. All agreed that our burden estimate was accurate and that the information we collect is necessary. There was a suggestion to provide more explanation for non-Federal employees. In response, we revised several field names using more easily understood terms and identified fields that were only for Department of the Interior or Service employees to complete. We contacted the following individuals:

Matthew Baldwin,
MD State DNR
Ph: 410 643-6788
Email: mbaldwin@dnr.state.md.us,

Robert Lafferty,
Alaska Fish and Game
Ph: 907 267-2889
Email: Robert_Lafferty@fishgame.state.ak.us,

Martin Chen, Pathology Tech,
Washington Dept of Fish & Game
Ph: 360 427-2195
Email: chenmfc@dpw.wa.gov,

Patrick Seymour,
Idaho Department of Lands
Ph: 208 769-1525
Email: pseymour@idl.state.id.us,

Matt Miller
Alaska Fish and Game
Ph: 907 267-2415
Email:
matt_miller@fishgame.state.ak.us
Emily Creely
DOWL Engineers
Ph: 907 562-2000
Email: ecreely@dowl.com

Eileen Ryce
Montana Fish and Game
Ph: 406 444-2448
Email: eryce@state.mt.us,

Nick Smith
New Mexico Dept of Game and Fish
Ph: 505 773-4845
Email: nsmith@state.nm.us,

Henry Springer
State of Alaska
Knik Arm Bridge Authority
Ph: 907 269-6679
Email: henry_springer@dot.state.ak.us

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

We do not provide payment or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The information collected is subject to the Privacy Act. Electronic system security measures are in place. The NCTC does not submit training records that can identify individuals to persons who do not have a need to know. Individuals can request their own transcripts or verify their enrollment status and supervisors can review for mandatory training requirements of only their staff. No other sources have access to the individual records. We only distribute summary reports to the Office of Personnel Management, Service Directorate, Division of Human Resources, etc.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

We do not ask questions of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:**

Form No.	Annual No. Of Respondents	Annual No. of Responses	Avg Time Per Response (minutes)	Annual Burden Hours	Annual Cost to Respondents
3-2193	724	724	5	60.33	\$904.25

In FY 2003, approximately 724 non-Federal students NCTC sponsored training classes. It takes each respondent approximately 5 minutes to complete the application. The total response time in hours is calculated by multiplying the number of responses by the average time per response and dividing by 60 to convert to hours. $((724 \times 5) / 60)$. The annual cost to respondents is computed by multiplying the total annual burden hours by \$15.00.

- 13. Provide an estimate of the total annual [non-hour] cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

There is no non-hour cost burden to respondents.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Form No.	Annual # Responses	Time Per Response (minutes)	Annual Hours	Annualized Costs to the Gov't
3-2193	724	5	60.33	\$2,956.33

Each application takes approximately 5 minutes to input into the system. The total hours is calculated by multiplying the number of responses by the average time per response and dividing by 60 to convert to hours $(724 \times 5) / 60$. The annualized costs are computed by multiplying \$49.00 by the annual hours.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

We have made adjustments to the annual burden from our previous submission due to a decrease in the number of respondents and an increase in the time to complete the application. Based on our outreach, we have increased the amount of time to complete the application and adjusted our burden hours accordingly.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This collection of information will not be published, except for internal management planning and evaluation reports to meet periodic reporting requirements of the Office of Personnel Management, the Fish and Wildlife Service's Service Directorate and Division of Human Resources, and the Office of Management and Budget (reports on training budget and total student training days).

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

No request regarding display of the expiration date is required.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

We are not requesting any exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.